DOUGLAS GODNIG, :

Plaintiff : No. 3:15-cv-02292

:

v. : Judge Mannion

:

STROUD AREA REGIONAL :

POLICE DEPARTMENT, et al., : Electronically Filed

Defendants:

MOTION FOR ENLARGMENT OF CASE MANAGEMENT DEADLINES

Pursuant to Fed. R. Civ. P. 6(b), defendants Thomas Sedor and Aaron Laurito (collectively "the Commonwealth Defendants") move the Court for an enlargement of the case management deadlines, and in support thereof state the following:

- 1. The discovery deadline is April 30, 2017.
- 2. The parties have conducted extensive paper discovery, and have deposed the Plaintiff. The depositions of two Defendants are scheduled for Friday, April 28, 2017.
- 3. Due to scheduling issues on the part of all counsel, and the substitution of new counsel on behalf of the Commonwealth Defendants, the parties have been unable to set a deposition date for the remaining two Defendants within the current discovery deadline.

- 4. The depositions of the remaining two Defendants has been scheduled for May 31, 2017.
- 5. In order to allow time to allow for these depositions, the Commonwealth defendants respectfully request that the Court enlarge the discovery deadline until May 31, 2017, and adjust all other case management deadlines accordingly.
 - 6. All parties concur and join in this request.
- 7. Granting this motion will not unreasonably delay this matter, and counsel for plaintiff and co-defendants concur in this motion.

WHEREFORE, the Court should grant this motion and extend the discovery deadline to May 31, 2017, and extend all other case management deadlines accordingly.

Respectfully submitted,

JOSH SHAPIRO Attorney General

By: s/Jessica S. Davis

JESSICA S. DAVIS Senior Deputy Attorney General Attorney ID 94560

KENNETH L. JOEL Chief Deputy Attorney General Chief, Civil Litigation Section

Counsel for Defendants, Laurito, Sedor, Commonwealth of Pennsylvania and Attorney General of the Commonwealth of Pennsylvania

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Date: April 26, 2017

DOUGLAS GODNIG, :

Plaintiff : No. 3:15-cv-02292

:

v. : Judge Mannion

:

STROUD AREA REGIONAL :

POLICE DEPARTMENT, et al., : Electronically Filed

Defendants:

CERTIFICATE OF CONCURRENCE

I, Jessica S. Davis, Senior Deputy Attorney General for the Commonwealth of Pennsylvania, Office of Attorney General, hereby certify that all counsel concur in this Motion.

s/Jessica S. Davis

JESSICA S. DAVIS

Senior Deputy Attorney General

DOUGLAS GODNIG, :

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Defendants:

CERTIFICATE OF SERVICE

I, Jessica S. Davis, Senior Deputy Attorney General for the Commonwealth of Pennsylvania, Office of Attorney General, hereby certify that on April 26, 2017, I caused to be served a true and correct copy of the foregoing document titled Motion for Enlargement of the Case Management Deadlines to the following:

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s/Jessica S. Davis

JESSICA S. DAVIS Senior Deputy Attorney General

DOUGLAS GODNIG, Plaintiff	: : No. 3:15-cv-02292
v.	: : Judge Mannion
STROUD AREA REGIONAL POLICE DEPARTMENT, et al., Defendants	: : Electronically Filed :
<u>ORDER</u>	
AND NOW, this day of	, 2017, upon
consideration of the Motion for Enlarge	ement of the Case Management Deadlines,
it is hereby ordered that the motion is G	GRANTED. The discovery deadline is May
31, 2017, and all other case managemen	nt deadlines shall be adjusted accordingly.
F	By the Court:
	Malachy E. Mannion United States District Judge